

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                                      |   |                                     |
|--------------------------------------|---|-------------------------------------|
| REBECCA FRANCESCATI,                 | ) |                                     |
|                                      | ) |                                     |
|                                      | ) |                                     |
|                                      | ) |                                     |
| Plaintiff,                           | ) | No. 1:11-cv-05270                   |
|                                      | ) |                                     |
| v.                                   | ) |                                     |
|                                      | ) | Honorable Marvin E. Aspen           |
| STEFANI JOANNE GERMANOTTA            | ) | Magistrate Judge Jeffrey T. Gilbert |
| p/k/a LADY GAGA, INTERSCOPE RECORDS, | ) |                                     |
| UNIVERSAL MUSIC GROUP, INC.,         | ) |                                     |
| DJ WHITE SHADOW, LLC, and            | ) |                                     |
| BRIAN JOSEPH GAYNOR,                 | ) | JURY TRIAL DEMANDED                 |
|                                      | ) |                                     |
| Defendants.                          | ) |                                     |

**DEFENDANT GERMANOTTA’S UNOPPOSED MOTION TO SEAL DKT. NOS. 153 & 154 AND FOR LEAVE TO FILE CORRECTED VERSIONS OF THOSE DOCUMENTS**

Defendant, Stefani Joanne Germanotta (“Germanotta”), by her attorneys, Proskauer Rose LLP, hereby files this motion to seal Defendants’ Reply in Support of Summary Judgment and Defendants’ Response to Plaintiff’s Statement of Additional Material Facts (“SAF”). (Dkt. No. 153 and Dkt. No. 154, brief only, respectively) and for leave to file corrected versions of those documents. In support thereof, Germanotta states as follows:

1. On April 29, 2013, Defendants filed electronically their Reply in Support of Summary Judgment and Response to Plaintiff’s Statement of Additional Material Facts (“SAF”). (Dkt. Nos. 153 & 154, respectively.) Each of those documents contains redactions to remove information that has been designated as confidential or highly confidential pursuant to the Agreed Protective Order (Dkt. No. 57) in this case.

2. On May 1, 2013, Defendants filed electronically under seal unredacted versions of these documents. (Dkt. Nos. 161 & 162.)

3. Counsel for Germanotta recently discovered that the redactions to the publicly-available versions of the Defendants' Reply in Support of Summary Judgment and Defendants' Response to Plaintiff's Statement of Additional Material Facts ("SAF") (Dkt. Nos. 153 & 154) permit the user to select and copy a redaction and then paste the text that had been redacted into a new document where the redacted text is then visible. Those filings have since been sealed to prevent public disclosure of confidential or highly confidential information. Defendant Germanotta respectfully requests that this Court order the Clerk of Court to maintain those documents under seal.

4. Defendant Germanotta further requests that Defendants be permitted to re-file corrected versions of those documents. Those corrected versions will contain redactions modified so they remain effective when cut or copied and pasted into new documents, but they will be otherwise identical to the previously-filed documents.

5. No party has any opposition to this motion.

WHEREFORE, Defendant Germanotta respectfully requests that this Court grant this motion; order the Clerk of Court to seal Dkt. No 153 and Dkt. No. 154; and grant Defendants leave to file corrected versions of those documents, with the redactions modified such that the redacted text cannot be selected and copied but that are otherwise identical to the previously-filed documents.

Dated: May 8, 2013

/s/Catherine J. Spector

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**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system on this 8<sup>th</sup> day of May, 2013.

*/s/ Catherine J. Spector*

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Catherine J. Spector